

# **EXHIBIT 4**

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

L.C., a minor by and through her  
guardian ad litem Maria Cadena,  
individually and as  
successor-in-interest to Hector Puga;  
I.H., a minor by and through his  
guardian ad litem Jasmine Hernandez,  
individually and as  
successor-in-interest to Hector Puga;  
A.L., a minor by and through her  
guardian ad litem Lydia Lopez,  
individually and as  
successor-in-interest to Hector Puga;  
and ANTONIA SALAS UBALDO,  
individually,

CASE NO.  
5:22-cv-00949  
-KK-(SHKx)

Plaintiffs,

vs.

STATE OF CALIFORNIA; COUNTY OF  
SAN BERNARDINO; S.S.C., a nominal  
defendant; ISAIAH KEE;  
MICHAEL BLACKWOOD; BERNARDO RUBALCAVA;  
ROBERT VACCARI; JAKE ADAMS;  
and DOES 6-10, inclusive,

Defendants.

VIDEOTAPED  
ZOOM DEPOSITION OF LIDIA LOPEZ  
WEDNESDAY, DECEMBER 4, 2024  
2:05 P.M.

REPORTED BY: VICTORIA FRENCH, CSR NO. 14193

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THROUGH CALIFORNIA HIGHWAY PATROL AND MICHAEL  
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ALSO PRESENT:

-BLAKE JONES, Legal Videographer

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I N D E X		
WITNESS: LIDIA LOPEZ		
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**Lopez, Lidia  
L.C., a minor v. State of California**

1 WEDNESDAY, DECEMBER 4, 2024, 2:05 P.M.

2 - - -

3 THE VIDEOGRAPHER: Good afternoon. This  
4 is the video deposition of Lidia Lopez, taken  
5 remotely on Wednesday, December 4th, 2024, in the  
6 matter of L.C. et al. versus State of California,  
7 County of San Bernardino, Case Number  
8 5:22-cv-00949-KK-(SHKx). This case is being heard  
9 in the United States District Court in the Central  
10 District of California.

11 My name of Blake Jones, legal  
12 videographer, contracted through Dean Jones Legal  
13 Videos, Incorporated, Los Angeles and Santa Ana,  
14 California. Since we're not in person today, the  
15 videographer might have to interrupt the proceedings  
16 if the deponent drifts out of frame or we have any  
17 connectivity issues. This deposition is commencing  
18 at 2:05 p.m.

19 Would all present please identify  
20 themselves, beginning with the deponent?

21 THE WITNESS: Lidia Lopez.

22 MS. GUSTAFSON: Shannon Gustafson for the  
23 San Bernardino County Defendants.

24 MS. ESQUIVEL: Diana Esquivel on behalf of  
25 the State of California, Officer -- California

1 Highway Patrol Officers Kee, Blackwood, and  
2 Rubalcava, appearing from Sacramento.

3 MS. LE: Hang Le on behalf of the deponent  
4 Lidia Lopez and the Plaintiffs.

5 THE VIDEOGRAPHER: Court reporter, please  
6 administer the oath.

7 - - -

8 LIDIA LOPEZ,  
9 having first declared under penalty of  
10 perjury to tell the truth, was examined  
11 and testified as follows:

12 -EXAMINATION-

13 BY MS. GUSTAFSON:

02:06:01 14 Q. Will you please state and spell your full  
02:06:03 15 name for the record?

02:06:04 16 A. Yes. Lidia Lopez, L-i-d-i-a, L-o-p-e-z.

02:06:15 17 Q. Have you ever gone by any other name other  
02:06:17 18 than Lidia Lopez?

02:06:18 19 A. No.

02:06:19 20 Q. Have you ever had your deposition taken  
02:06:19 21 before?

02:06:20 22 A. No.

02:06:21 23 Q. Since this is a new process to you, I'm  
02:06:23 24 just going to go ahead and explain some of the  
02:06:27 25 ground rules. I'm sure you had an opportunity to

03:13:00 1 gone?

03:13:02 2 Q. The last time you talked to her.

03:13:04 3 A. She called Allyson this morning.

03:13:10 4 Q. Does she regularly call Allyson?

03:13:13 5 A. She calls her in the nighttime, or Allyson  
03:13:15 6 will call her when I'm free for her to talk to her.

03:13:21 7 Q. When was the last time that Allyson saw  
03:13:26 8 Antonia?

03:13:27 9 A. She came for her 3rd birthday party.

03:13:33 10 Q. Do you know where Antonia currently lives?

03:13:37 11 A. Yeah. In Long Beach.

03:13:43 12 Q. How far is Long Beach from Bell?

03:13:51 13 A. About maybe 20 to 25 minutes.

03:13:59 14 Q. You had told me earlier that you were no  
03:14:02 15 longer in a relationship with Hector in February of  
03:14:06 16 2021.

03:14:08 17 What was the reason your relationship with  
03:14:10 18 him ended while you were still pregnant with  
03:14:13 19 Allyson?

03:14:19 20 A. It's kind of, like, I'm a stay-at-home  
03:14:26 21 person, and, you know, he liked to be outdoors a  
03:14:30 22 lot, and it's just we were not compatible.

03:14:41 23 Q. Were you aware that Hector had been  
03:14:42 24 arrested before he was in a relationship with you?

03:14:47 25 A. Not that I recall.

03:14:48 1 Q. Did he ever tell you that he had been  
03:14:50 2 arrested?

03:14:54 3 A. Yeah, but I don't know why.

03:14:57 4 Q. Did you ever ask him why he had been  
03:14:59 5 arrested in the past?

03:15:01 6 A. No.

03:15:03 7 Q. Were you concerned at all that he had been  
03:15:05 8 arrested previously?

03:15:07 9 A. No.

03:15:08 10 Q. Why not?

03:15:12 11 A. I just didn't think of asking him why. I  
03:15:17 12 mean, he was out, and that's all I cared for.

03:15:23 13 Q. Were you aware that he had been in jail in  
03:15:26 14 prison?

03:15:28 15 A. Not that I recall.

03:15:31 16 Q. Did Hector ever tell you that he had spent  
03:15:33 17 time in prison?

03:15:34 18 A. No.

03:15:35 19 Q. Is me asking the question the first time  
03:15:45 20 you learned that he had previously been to prison?

03:15:48 21 A. I mean, I've heard it around, but that's  
03:15:51 22 as much as I know about it.

03:15:53 23 Q. And what do you mean you heard it around?

03:15:55 24 A. I mean, people talk, Facebook. I mean,  
03:15:58 25 there's internet.



1 I, Victoria French, CSR No. 14193, certify:  
2 that the foregoing proceedings were taken before me  
3 at the time and place herein set forth; at which  
4 time the witness was duly sworn; and that the  
5 transcript is a true record of the testimony so  
6 given.

7 Witness review, correction and signature was

8 (X) by Code. ( ) requested.

9 ( ) waived. ( ) not requested.

10 ( ) not handled by the deposition officer due to  
11 party stipulation.

12 The dismantling, unsealing, or unbinding of  
13 the original transcript will render the reporter's  
14 certificate null and void.

15 I further certify that I am not financially  
16 interested in the action, and I am not a relative or  
17 employee of any attorney of the parties, nor of any  
18 of the parties.

19  
20 Dated this 14th day of January, 2025

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23 

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Victoria French